## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

SARAH EDMONDSON, et al.,

Plaintiffs,

1:20-cv-00485-EK-CLP

v.

KEITH RANIERE, et al.,

Defendants.

DEFENDANT CLARE BRONFMAN'S NOTICE OF MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law,

Defendant Clare Bronfman hereby moves this Court for an order, pursuant to Rules 8(a)(2), 9(b), 12(b)(1), and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing with prejudice Plaintiffs' First Amended Complaint against her.

Dated: January 28, 2022

Jeffrey B. Korn WILLKIE FARR & GALLAGHER LLP 787 Seventh Avenue New York, New York 10019-6099

Tel: (212) 728-8000 Fax: (212) 728-8111

Ronald S. Sullivan, Jr. 712 H Street NE, Suite 1354 Washington, DC 20002 Tel: (212) 873-9120

Tel: (212) 873-9120 Fax: (202) 863-1459

Respectfully submitted,

/s/ Craig C. Martin

Craig C. Martin Sara T. Horton WILLKIE FARR & GALLAGHER LLP 300 North LaSalle Street, Suite 5000 Chicago, Illinois 60654

Tel: (312) 728-9000 Fax: (312) 728-9199

Attorneys for Defendant Clare Bronfman